AFFIDAVIT

- I, Jason Manning, being duly sworn, depose and state as follows:
- 1. I am a Special Agent with the United States Postal Service ("Postal Service") Office of Inspector General ("OIG") and have been so employed since October 2008. Prior to working for the Postal Service OIG, I was employed as a Special Agent with the District of Columbia Office of Tax and Revenue for three years. I am currently assigned to the Northeast Area Field Office, Financial Fraud/Mail Theft Team. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
- 2. This Affidavit is submitted in support of a criminal complaint and arrest warrants for CYRIL MURRAY ("MURRAY"), ANGEL RIVERA ("RIVERA"), ANDRE WILLIAMS ("WILLIAMS"), WILIE ESTRELLA ("ESTRELLA"), DARREN CAMACHO, and FERNANDO CAMACHO. As will be shown below, there is probable cause to believe that between approximately March 1, 2023, and February 13, 2024, MURRAY, RIVERA, WILLIAMS, ESTRELLA, Ryan Lee ("Lee"), DARREN CAMACHO, and FERNANDO CAMACHO conspired with one another to steal mail, in violation of 18 U.S.C. § 371.
- 3. Further, there is probable cause to believe that between approximately March 1, 2023, and February 13, 2024, MURRAY, RIVERA, and WILLIAMS stole letters intended to be conveyed by mail while employed by the United States Postal Service, in violation of 18 U.S.C. § 1709.
- 4. In addition, there is probable cause to believe that between approximately March 1, 2023, and June 26, 2023, FERNANDO CAMACHO and DARREN CAMACHO stole letters intended to be conveyed by mail while they were employed by the United States Postal Service, in violation of 18 U.S.C. § 1709.

- 5. In addition, there is probable cause to believe that between approximately December 2, 2023, and December 29, 2023, ESTRELLA stole letters intended to be conveyed by mail while he was employed by the United States Postal Service, in violation of 18 U.S.C. § 1709.
- 6. The statements in this Affidavit are made based upon my personal participation in this investigation, review of various documents, as well as information provided to me by other members of the OIG, as well as members of the United States Postal Inspection Service, Providence Police Department and other law enforcement officers, my own training and expertise as a criminal investigator, as well as the training and expertise of other criminal investigators involved with this investigation. I have set forth the facts that I believe establish probable cause to believe that MURRAY, RIVERA, WILLIAMS, ESTRELLA, DARREN CAMACHO, and FERNANDO CAMACHO violated the aforementioned criminal statutes.

STATEMENT OF PROBABLE CAUSE

Members of the Conspiracy

- 7. MURRAY, RIVERA, WILLIAMS, ESTRELLA, DARREN CAMACHO, and FERNANDO CAMACHO, along with Lee, were each employed with the Postal Service during the time period relevant to this investigation.
 - a. MURRAY is employed as a Postal Service supervisor. He was hired on March 11, 2014, and was promoted to the role of supervisor in December 2016. He remains an employee (albeit on paid emergency leave status) as of the writing of this Affidavit.
 - b. Lee was employed as a Postal Service Mail Processing Clerk. He was hired on March 14, 2021, and he resigned from the Postal Service effective March 28, 2024.

- c. RIVERA is employed as a Postal Service Mail Processing Clerk. He was hired on August 14, 2021, and remains an employee (albeit on unpaid emergency leave status) as of the writing of this Affidavit.
- d. WILLIAMS is employed as a Postal Service Mail Processing Clerk. He was hired on November 7, 2021, and remains an employee (albeit on unpaid emergency leave status) as of the writing of this Affidavit.
- e. ESTRELLA was employed as a Postal Service Postal Support Employee ("PSE")¹ for the holiday season. He was hired on December 2, 2023, and his employment with the United States Postal Service terminated on December 29, 2023.
- f. DARREN CAMACHO was employed as a Postal Service Mail Processing Clerk. He was hired on October 9, 2018, and placed on unpaid emergency leave status on or about June 26, 2023. He remains an employee (albeit on unpaid emergency leave status) as of the writing of this Affidavit.
- g. FERNANDO CAMACHO was employed as a Postal Service PSE Mail Processing Clerk. He was hired on August 14, 2022, and placed on unpaid emergency leave status on or about June 26, 2023. He remains an employee (albeit on unpaid emergency leave status) as of the writing of this Affidavit. FERNANDO CAMACHO is a relative of DARREN CAMACHO.
- 8. All Postal Service employees are required to sign a PS Form 8139, "Your Role in Protecting the Security of the United States Mail." The form advises employees that they must safeguard the mail and that theft, delay, desertion, destruction or obstruction of U.S. mail can result

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¹ PSE employees are considered temporary (up to one year) help until they are converted/hired as "Career employees."

in criminal charges, including a charge of Theft of Mail Matter by Officer or Employee pursuant to 18 U.S.C. § 1709.

Missing Gift Cards

- 9. In March of 2023, Postal Service OIG Special Agent Anthony Matarese ("SA Matarese") was notified of irregularities in a piece of mail at the Providence, Rhode Island Processing and Distribution Center ("distribution center") located at 24 Corliss Street, Providence, RI. Specifically, the envelope on the piece of mail was opened. SA Matarese obtained a photocopy of the envelope, which bore a postmark of March 28, 2023. The sender² advised that the envelope contained a \$150 Vanilla Visa gift card³ purchased from a local retail establishment. The envelope did not contain the expected Vanilla Visa gift card when inspected by SA Matarese.
- 10. Further investigation into the Vanilla Visa gift card revealed that it had been activated on March 27, 2023, at 19:50:37 with a balance of \$150. The card showed authorized transactions that occurred at the following stores, locations, and times below:

<u>Date</u>	<u>Time</u>	<u>Merchant</u>	Location	Amount
03/30/23	13:10:19	LOWES #1505	Cranston, RI	\$42.25
03/31/23	11:43:21	RINGSIDE COLLECTIBLES INC.	Hewlett, NY	\$36.30
03/31/23	12:40:24	STARBUCKS STORE 07355	Cranston, RI	\$30.87
03/31/23	19:50:22	CVS/PHARMACY #00994	Providence, RI	\$40.58

² The identities of the sender and intended recipient are known to your Affiant. Their names are redacted from this document to comply with Fed. R. Crim. P. 49.1.

³ A Vanilla Visa gift card is a prepaid Visa card that can be used anywhere a Visa debit card is accepted. The card allows the recipient to make purchases (up to the value of the card) online and in-person at retail establishments.

- 11. Review of postal service records revealed that FERNANDO CAMACHO worked at the distribution center on March 26, 2023, March 27, 2023, March 29-March 30, 2023, and March 30-March 31, 2023. These dates covered the time period when the mail containing the Vanilla Visa gift card would have come through the distribution center in Providence, RI.
- 12. Review of surveillance footage from CVS (a retail establishment and pharmacy) in Providence, RI revealed a man matching FERNANDO CAMACHO's description and a minor female use the Vanilla Visa card on March 31, 2023. Further, footage from Starbucks (a coffee house and roastery) in Cranston, RI depicted a man matching FERNANDO CAMACHO's description and two other individuals use the Vanilla Visa card at that establishment on March 31, 2023.
- 13. Law enforcement contacted Ringside Collectables Inc. regarding the charge on the Vanilla Visa card for \$36.30 that occurred on March 31, 2023. Ringside Collectibles provided information about the purchase, specifically the recipient's name of FERNANDO CAMACHO and the mailing address for the items. The provided address matched the address the Postal Service had on record for FERNANDO CAMACHO.
- 14. Law enforcement contacted Lowes (a home improvement store) regarding the charge on the Vanilla Visa gift card for \$42.25 that occurred on March 30, 2023. Lowes provided surveillance footage, and law enforcement was able to determine that a man matching FERNANDO CAMACHO's description used the Vanilla Visa gift card at the self-service kiosk purchasing station at the Lowes store located at 247 Garfield Ave, Cranston, RI 02920.
- 15. In April 2023, a second piece of mail was flagged, this time by the recipient. The recipient received an envelope and card that had been opened prior to its delivery. The recipient reported to law enforcement that the card should have contained a \$300 Lowes gift card. The

recipient was able to track down the gift card and learned that it had been used at the Lowes store in Warwick, RI. Law enforcement reviewed Lowes' surveillance footage and determined that on March 30, 2023, a man matching FERNANDO CAMACHO's description used the Lowes gift card at the self-service kiosk purchasing station at the Lowes store located at 247 Garfield Ave, Cranston, RI 02920.

- 16. A state arrest warrant was issued for FERNANDO CAMACHO, charging him with embezzlement, access to a computer for fraudulent purposes, and fraudulent use of a credit card. These charges are pending in the state of Rhode Island as of the writing of this Affidavit.
- 17. On June 28, 2023, law enforcement traveled to FERNANDO CAMACHO's address in an attempt to serve the arrest warrant. After conversations with relatives, FERNANDO CAMACHO arrived at the residence and was arrested without incident.
- 18. On that same date, FERNANDO CAMACHO was advised of his *Miranda* and *Garrity* rights, which he freely and voluntarily waived. His interview with law enforcement was audio and video recorded. When questioned about the gift cards he used, FERNANDO CAMACHO stated that he purchased about twenty gift cards from an individual at the Walmart in Warwick, RI. He denied stealing gifts cards from his work at the Postal Service.
- 19. Law enforcement obtained a state search warrant for FERNANDO CAMACHO's residence at 224 Webster Avenue, Floor 2, Providence, RI 02909. The warrant was executed on June 28, 2023. Law enforcement seized approximately 55 gift cards and 9 gift card receipts/gift card holders from the residence. One of the receipts recovered was from Louboutin, a high-end shoe store. The receipt detailed a purchase made on May 31, 2023, with a purchase amount of \$687.18. The receipt bore the name DARREN CAMACHO.

- 20. Further investigation into the purchase at Louboutin uncovered video surveillance of the Louboutin store located in Boston, MA. The footage depicted a man matching the description of DARREN CAMACHO making the purchase on May 31, 2023. Several gift cards were used to complete the sale. A review of the video surveillance also showed that two individuals matching the descriptions of ANDRE WILLIAMS and ANGEL RIVERA were with DARREN CAMACHO at the time of the purchase. The three individuals are seen purchasing items at Louboutin and paying for items with a large bundle of cash.
- 21. On June 13, 2023, a postal customer requested assistance related to a greeting card that was mailed from a Falmouth, MA branch of the post office on May 30, 2023, but was never delivered to the recipient. The sender reported to law enforcement that the greeting card contained a \$150 Dick's Sporting Goods gift card. Law enforcement reviewed Dick's Sporting Goods video surveillance and determined that a man matching DARREN CAMACHO's description used the Dick's Sporting Goods gift card at a store located at 275 Highland Avenue, Seekonk, MA 02771.
- 22. DARREN CAMACHO was interviewed by law enforcement on June 28, 2023. He was advised of his *Miranda* rights, which he freely and voluntarily waived. The interview was audio recorded. DARREN CAMACHO admitted that he used the Dick's Sporting Goods gift card but denied taking it from the mail. He stated that he received the gift card from another postal service employee. DARREN CAMACHO declined to provide the individual's name who supplied him with the gift card, but he acknowledged that he knew the gift cards probably did not belong to the individual.
- 23. In January 2024, a postal customer requested assistance related to four pieces of mail that the customer sent from a Cranston, RI branch of the post office on December 12, 2023,

but were never delivered to the recipient. The four pieces of mail at issue contained a total of eight gift cards, including a \$75 Target gift card.

- 24. Further investigation revealed that the Target gift card was used by a woman at the Target located in Smithfield, RI on December 28, 2023. Surveillance footage from the Target store at the time of the transaction was circulated through law enforcement channels to identify the woman. K.W., a member of law enforcement, identified herself as the woman using the Target gift card. K.W. indicated that she received the gift card, along with others, from her father, K.E.
- 25. K.E. was interviewed by law enforcement. He advised that he purchased several gift cards from a couple outside the Walmart in Providence, RI in the fall of 2023. The female paid for his dog food in exchange for half the cost of the dog food being given to her for the gift cards. He further stated that he purchased additional gift cards from the same couple on Douglas Avenue several months later. K.E. advised that he gave his daughter K.W. several of the gift cards.
 - 26. Both K.E. and K.W. are relatives of ANDRE WILLIAMS.
- 27. In March 2023, a postal customer requested assistance related to a piece of mail that a customer sent from an Oak Bluffs, MA branch of the post office, but was never delivered to the recipient. The piece of mail at issue contained a \$100 Target gift card. Further investigation revealed that the Target gift card was used by a woman at the Target Store located in Smithfield, RI on March 23, 2023.
- 28. In May 2023, another postal customer requested assistance related to a piece of mail that a customer sent from a Cumberland, RI branch post office, but was never delivered to the recipient. The piece of mail at issue contained a \$50 T.J. Maxx gift card. Further investigation revealed that the T.J. Maxx gift card was used by a woman at the T.J. Maxx Store located in Smithfield, RI on May 24, 2023.

29. Online databases and social media platforms were queried for associates of DARREN CAMACHO. K.C. was identified as being associated to DARREN CAMACHO and her photo resembled the person in surveillance videos at Target and T.J. Maxx. On January 2, 2024, K.C. was questioned by local law enforcement regarding the reported stolen gift cards. On January 18, 2024, K.C. was arrested by local law enforcement, and she was advised of her Miranda rights. K.C. stated that her child's father, DARREN CAMACHO, gave her the gift cards. K.C. denied knowing the gift cards were stolen; however, she stated DARREN CAMACHO often gave her gift cards in lieu of child support payments.

Stolen Mail at the Distribution Center

- 30. On January 31, 2024, an anonymous postal employee reported seeing Lee put mail into his backpack. MURRAY, a supervisor on duty at the time, performed a search of Lee's backpack. MURRAY reported he did not find any mail in Lee's backpack.
- 31. On February 13, 2024, an anonymous postal employee reporting seeing Lee put mail into his backpack. A supervisor searched Lee's bag and found 305 pieces of mail concealed inside. Lee was put into emergency placement (off duty) status by Postal Service management.
- 32. Law enforcement began reviewing surveillance footage from the distribution center from approximately December 1, 2023, to February 13, 2024. The surveillance footage showed Lee, RIVERA, and ESTRELLA going through the mail in trays and picking out the bright colored envelopes that appeared to be greeting cards. Later, they placed that mail into their personal backpacks. Surveillance footage also showed Lee hand off trays of the mail he had separated to MURRAY. MURRAY then walked out of the camera view with the trays of mail.

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⁴ Title 39 CFR § 232.1(b)(1) provides that purses, briefcases, and other containers brought into the employee areas of any Postal Service property, found in the employee areas on Postal Service Property, or being removed from employee areas on Postal Service property are subject to inspection.

- 33. Specifically, on December 14, 2023, ESTRELLA is captured on surveillance footage taking a tray of specially sorted mail and concealing it behind a rack of trays. ESTRELLA then removes many of the cards from the tray and conceals them inside an item hidden from view. Moments later, ESTRELLA moves his backpack from that same location where the cards disappeared.
- 34. On December 15, 2023, ESTRELLA is captured on surveillance footage moving a tray of specially sorted mail and concealing it behind a rack of trays. ESTRELLA then conceals the cards inside an object hidden from view. ESTRELLA moves the then-empty tray back on top of a machine.
- 35. On December 16, 2023, ESTRELLA is captured on surveillance footage taking a tray of specially sorted mail and concealing the cards inside his backpack.
- 36. On December 19, 2023, ESTRELLA brings a tray of specially sorted mail to Lee, who then combines that mail with a second tray of specially sorted envelopes.
- 37. On December 21, 2023, and December 23, 2023, ESTELLA is captured on surveillance footage taking trays of specially sorted mail into another area of the Distribution Center to facilitate its removal from the Distribution Center.
- 38. On January 31, 2024, RIVERA is captured on surveillance footage separating bright colored envelopes from the rest of the mail. Later that same evening, RIVERA places the cards inside an object hidden from view. RIVERA later removes his backpack from the same location where the cards disappeared.
- 39. On February 14, 2024, Lee was interviewed by law enforcement. He was advised of his *Miranda* rights, and he freely and voluntarily waived those rights. Lee at first attempted to minimize his involvement in thefts from the post office, but ultimately described that RIVERA,

DARREN CAMACHO, FERNANDO CAMACHO, ESTRELLA, and WILLIAMS worked together to steal mail from the distribution center. Lee explained that each person had backpacks, and they put the greeting cards in the backpacks. The group then left the distribution center at the end of their shifts and met up at a nearby location. They opened the cards and removed gift cards, cash, and checks. Lee advised that they split the cash. He explained that DARREN CAMACHO took gift cards; RIVERA took gift cards, cash, and checks; ESTRELLA took the checks and gift cards; and Lee himself took only cash.

- 40. Lee further advised that as a supervisor, MURRAY functioned in a lookout-type capacity, and he concealed trays of greeting cards for the crew. MURRAY joined the crew at their meet-up location and took his cut of the cash from the greeting cards.
- 41. MURRAY was interviewed on February 22, 2024. At first, he declined to have his interview recorded. He was advised of his *Garrity* rights and signed the form. Soon after, he terminated the interview. He then decided to continue speaking with law enforcement and allowed the remainder of the conversation to be recorded. MURRAY advised that the theft ring had been going on for approximately two years. MURRAY advised that at some point, he became aware of the identities of the thieves and did nothing to stop them. He "just fell into it" and did not report them. He identified Lee, DARREN CAMACHO, FERNANDO CAMACHO, RIVERA, WILLIAMS, and ESTRELLA as members of the crew stealing mail.
- 42. MURRAY advised that the crew used their backpacks to take mail out of the distribution center. The crew then met after work to divide the spoils. He would arrive at the meet-up location after he finished his supervisor closing duties to collect his cut, which he took in cash. He advised that RIVERA and ESTRELLA took the checks. DARREN CAMACHO, FERNANDO CAMACHO, and RIVERA took gift cards. He stated that Lee only took cash.

- 43. On March 6, 2024, ESTRELLA was interviewed by law enforcement. He was advised of his *Miranda* rights, and he freely and voluntarily waived those rights. ESTRELLA denied stealing any mail from the distribution center. When shown a photograph and told of a video depicting ESTRELLA separating greeting cards and placing them on top of the sorter machine, then placing cards in his backpack, ESTRELLA stated, "I was just doing exactly what they told me to do, boss."
- 44. Under federal law, Conspiracy is a crime pursuant to 18 U.S.C. § 371. A person is guilty of Conspiracy if he willfully joined in an agreement between at least two people to steal mail while employed as postal employees.
- 45. Under federal law, Theft of Mail by Postal Employee is a crime pursuant to 18 U.S.C. § 1709. A person is guilty of Theft of Mail by Postal Employee if he, while employed by the United States Postal Service, stole, abstracted, or removed any article or thing contained in a letter, package, bag, or mail, and the item came into his or her possession intended to be conveyed by mail, or carried or delivered by mail.
- A6. Based upon the foregoing, I believe there is probable cause to believe that between approximately March 1, 2023, and February 13, 2024, MURRAY, RIVERA, WILLIAMS, ESTRELLA, DARREN CAMACHO, and FERNANDO CAMACHO conspired with one another and with Ryan Lee to steal mail, in violation of 18 U.S.C. § 371. Further, there is probable cause to find that between approximately March 1, 2023, and February 13, 2024, MURRAY, RIVERA, and WILLIAMS stole letters intended to be conveyed by mail while employed by the United States Postal Service, in violation of 18 U.S.C. § 1709. In addition, there is probable cause to believe that between approximately March 1, 2023, and June 26, 2023, FERNANDO CAMACHO and DARREN CAMACHO stole letters intended to be conveyed by mail while they were employed

by the United States Postal Service, in violation of 18 U.S.C. § 1709. In addition, there is probable cause to believe that between approximately December 2, 2023, and December 29, 2023, ESTRELLA stole letters intended to be conveyed by mail while he was employed by the United States Postal Service, in violation of 18 U.S.C. § 1709.

- Joseph Many

Jason Manning Special Agent, United States Postal Service - Office of Inspector General

Attested to by the applicant in accordance with the requirements of Fed.

R. Crim. P. 4.1 by **Telephone**. (specify reliable electronic means)

May 8, 2024

Date

Providence RI

City and State

Judge's signature

Lincoln D. Almond, US Magistrate Judge